

**IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE**

PHIL BREDESEN,
Governor of the State of Tennessee,

Plaintiff,

v

**TENNESSEE JUDICIAL
SELECTION COMMISSION,**

Defendant.

No.06-2275 (III)

FILED
2006 DEC 22 AM 11:28
CLERK & MASTER
DAVIDSON CO. CHANCERY CT.
D.C. & M.

NOTICE FOR STAY PENDING APPEAL

Comes now the necessary party/intervenor, J. Houston Gordon ("Gordon"), pursuant to Rule 62 to move this court for a stay of its final judgment and order filed December 14, 2006, and would show:

I.

Gordon has timely filed a notice of appeal.

II.

The issues in this matter are of paramount importance to the confidence that the citizens, bench and bar have in the selection and appointment of members of our State's highest Court.

III.

The movant is seeking an expedited appeal in this matter to the Tennessee Supreme Court pursuant to its jurisdiction under T.C.A. §16-3-201(d) and a suspension of the rules in order to expedite a hearing and decision by the Supreme Court which could occur at its February term in Nashville.

IV.

Clarification of the important issues sought by the Governor and the Judicial Selection Commission, as well as by intervenors, should be finally enunciated by the Tennessee Supreme Court and, absent a stay, further legal issues may arise during the pendency of this appeal.

FOR THESE REASONS, this Honorable Court is respectfully requested to stay its order pending the appeal of its final judgment of December 14, 2006.

RESPECTFULLY SUBMITTED this the 22nd day of December, 2006.

BY:



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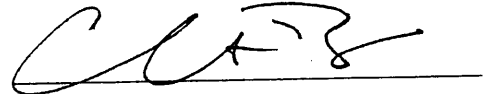
CERTIFICATE OF SERVICE

Counsel for Intervenor certifies that on this the 22nd day of December 2006, a true and correct copy of the foregoing was mailed and/or hand delivered to:

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A handwritten signature in black ink, appearing to read "R. E. Cooper, Jr.", is written over a horizontal line.